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## Remarks

The Examiner has objected to the specification at various locations for having browser executable code as stipulated in MPEP § 608.01. In responding to these objections, the Applicant has removed the executable portion of the website references. Review and acceptance is requested.

Some additional amendments to the specification have been taken to correct minor typographical and grammatical errors.

Claim 5, and 7 through 10 stand rejected under 35 USC 112 second paragraph as lacking clarity. The Examiner specifically refers to the terms "oc" and "oid" as not being defined in the claims. The Applicant does not understand the rejection of claim 5, since these terms are not used in that claim. With regard to the other claims, the objectable terms have been replaced. Review and acceptance is requested.

Claims 1 through 21 stand rejected under 35 USC 103(a) as being unpatentable over Delcamber et. al. '566 in view of Dutta et. al '854.

In responding to these rejections, the Applicant has amended claim 1 to incorporate the features of claim 5 which has accordingly been cancelled. Claim 1 as amended recites a particular method for transforming semi-structured data and semi-structured queries into LDAP data and LDAP queries. The Delcamber reference discloses a generic transformation engine from one format (XML) to other formats

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such as RDF, a topic map or a relational data base. However, Delcamber is silent concerning transformation into LDAP.

With regard to the Dutta reference, Dutta is concerned with the development of a method to improve the results provided by search engines such as Yahoo and Google upon execution of a search query provided by the user. Dutta discloses a peer to peer approach with several search engines cooperating with each other by exchanging information regarding the quality of the results so that if a user performs a query (looks for a particular concept) the group of search engines are able to cooperate with each other to provide better (higher) quality results. Dutta does discuss LDAP as one possible query language but does not provide any suggestion for transformation of a semi-structure language such as XML into LDAP. LDAP is merely mentioned in Dutta as a communication protocol (column 3, lines 33 to 36) and there is no intention in the Dutta disclosure for mapping from XML or another semi-structure language into LDAP. Neither Delcamber nor Dutta suggest a manner in which such a transformation should be carried out.

The Applicant submits that, although it may be obvious to desire a given transformation from a semi structured format to another format, the manner in which such a transformation is performed is by no means thereby rendered obvious. As is well known in the field of computer theory, mathematical models can be used to define and determine transformations from one class of formats to another and proofs can verify the theoretical existence of a given transformation. However, the fact that a given transformation theoretically exists does not itself define the actual structure of that transformation. There have been

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cases in the past where people of skill in the art have been unable to find a particular transformation although it had been proven that a transformation must exist (examples thereof are NP completeness and related problems). Therefore, the fact that a given transformation theoretically exists does not in any way render the precise structure of the transformation obvious.

Applying these remarks to the case at hand, the fact that Delcamber teaches a transformation for XML into RDF does not in and of itself provide any suggestion to one of average skill in the art of how to transform XML or any other semi-structured language into LDAP. There are many examples in which such a particular transformation cannot be found (see NP completeness, the 3-SAT problem, the 2-SAT problem, the traveling salesman problem etc.).

The Examiner refers to paragraph 004 and 0036 of Delcamber with regard to the specific rejection of former claim 5, whose features are now incorporated in claim 1. In paragraph 004 Delcamber states "the representation scheme for XML includes elements and attributes and permits elements to be nested". This statement by Delcamber is a general statement that simply describes the fact that XML contains elements and attributes. Although these elements and attributes are named in a manner similar to the elements and attributes used in LDAP, they are, in fact, not the same. Moreover, it is not obvious that elements in XML can be mapped into elements in LDAP and that attributes in XML can be mapped into attributes in LDAP. In fact, such a straightforward one to one mapping does not work and is not being claimed by the instant invention. With regard to paragraph 0036 of

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Delcamber, that paragraph basically contains the same disclosure as in paragraph 004. The problem addressed by the invention is not merely that of inserting data into a LDAP directory, but rather deciding in which location in the hierarchy that data should be located. Delcamber does not propose assigning a distinguished name to each of the data nodes to define a unique location in the LDAP hierarchy at the instance level.

For the reasons given above, the Applicant believes that none of the prior art of record suggests or motivates one of average skill in the art to utilize the particular method claimed for mapping semi-structured data and queries into LDAP. These remarks also apply to Independent claim 20, since that claim simply uses functional language to claim a device in one to one correspondence with the method of claim 1. The remaining claims of record inherit the limitations of their respective base claim and are therefore also patentable for the reasons given. The Applicant therefore respectfully submits that this case is in a position for allowance and requests passage to issuance.

No new matter has been added in this amendment.

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Respectfully submitted,

Paul Vincent

Dr. Paul Vincent

Registration number 37,461

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Date

Geitz, Truckenmüller + Lucht

Patentanwälte

Werderring 15

D-79098 Freiburg

Telephone: +49-(0) 761-45 70 52 0

Fax: +49-(0) 761-45 70 52 1

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